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IN THE MATTER OF THE GENERIC
INVESTIGATION INTO NUMBER
RESOURCE OPTIMIZATION AND
IMPLEMENTATION OF NUMBER POOLING
IN ARIZONA

DOCKET NO. T-00000A-01-0076

QWEST CORPORATION'S WRITTEN
COMMENTS

Qwest Corporation ("Qwest") submits the following written comments in response to the Arizona Corporation Commission's ("Commission") Procedural Order of February 13, 2001, requesting input from interested parties and members of the industry concerning implementation of number pooling and other number conservation methods in the State of Arizona. Qwest's addresses the following issues in order:

1. Which Metropolitan Statistical Area ("MSA") should be selected for the first pooling trial?

The most cost effective manner to deploy a state pooling trial is to place the pooling trial within the same area that the national rollout of pooling will occur. The FCC's national rollout will occur in the top 100 MSAs first, followed by other MSA areas. The FCC established these criteria based on the

1 assumption that the maximum benefits of pooling will be derived
2 from deploying pooling in the most populous areas first. Based on
3 the FCC's criteria, the National pooling trials should be
4 deployed in the highest-ranking 100 MSAs in the Nation. There are
5 two top 100 MSAs in Arizona, the Phoenix MSA, which is ranked 17,
6 and the Tucson MSA, which is ranked 71. Tucson is served by the
7 520 NPA. There is a NPA relief project for the 520 NPA scheduled
8 to begin with permissive dialing in June 2001 and completed in
9 January 2002. Therefore, it is suggested that the Arizona pooling
10 trial be implemented in the Phoenix MSA.

11 **2. If the MSA contains multiple NPAs, which NPA should be**
12 **first?**

13 There are three NPAs in the Phoenix MSA. The 602 NPA is
14 forecasted to exhaust in March 2006; the 480 NPA is forecasted to
15 exhaust in June 2008; and the 623 NPA is forecasted to exhaust in
16 June 2010. At this time, the 602 NPA will receive the most
17 benefit from pooling and should be selected as the first NPA to
18 be pooled.¹

19 **3. What is an appropriate interval for implementing number**
20 **pooling between NPAs where more than one exists in a MSA?**

21 It takes six months to complete all of the activities
22 necessary to prepare an NPA for pooling. This interval includes
23 record clean up and validation, forecasting and utilization
24 reports, block ID, block donation, etc. It is recommended that a

25

26

¹ The NPA exhaust data was acquired from the April 2000 Central Office Code Utilization Survey issued by NANPA and updated in January 2001.

1 six-month implementation interval be allowed for each of the
2 three NPAs in the Phoenix MSA.

3 4. If the geographic area of a NPA is greater than the
4 MSA, should number pooling be implemented in the entire NPA?

5 No. Number pooling should be deployed in accordance with the
6 FCC guidelines which specify that the greatest benefit will be
7 realized by pooling in NPAs located in the top 100 MSAs. In
8 addition, the FCC also clarified that where an NPA encompasses
9 areas both inside and outside a qualifying MSA, pooling will be
10 required only in those rate centers that are part of the MSA.

11 5. How soon in 2001 might a number pooling trial begin?

12 The pooling start date for the 602 NPA should be October
13 2001; April 2002 for the 480 NPA; and October 2002 for the 623
14 NPA. This provides a six-month implementation interval for each
15 of the three NPAs. It also avoids conflicts with the
16 implementation of previously scheduled pooling trials in other
17 portions of the Western NPAC Region, which involve most of the
18 same Qwest employees that will be required to implement the
19 pooling trial in Arizona. Furthermore, implementing the pooling
20 trial in the 602 NPA will avoid conflict with the implementation
21 of the 520/928 NPA split.

22 6. How should number pooling costs be allocated (all
23 carriers, pooling carriers only, only carriers within the MSA,
24 etc.)?

25 Four FCC orders address requirements for cost recovery of
26 Thousand Block Number Pooling (TBNP) trials:

1 a. FCC 00-104, *Numbering Resource Optimization*, Report and
2 Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574
3 (rel. Mar. 31, 2000) [*Numbering Resource Optimization Order or*
4 *First Report and Order*] paragraphs 195 through 226;

5 b. *Numbering Resource Optimization*, Order, CC Docket No. 96-
6 98, 99-200, DA-00-1616 (rel. July 20, 2000) (addressing petitions
7 for additional delegated authority to implement numbering
8 resource optimization strategies filed by the following state
9 commissions: Arizona, Colorado, Georgia, Indiana, Iowa, Kentucky,
10 Missouri, Nebraska, North Carolina, Oregon, Pennsylvania,
11 Tennessee, Utah, Virginia, and Washington). [*State Delegation*
12 *Order*] paragraphs 19 through 22;

13 c. FCC 00-429, *Second Report and Order*, Order on
14 Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200,
15 and Second Further Notice of Proposed Rulemaking in CC Docket No.
16 99-200, Released December 29, 2000 in CC Docket No. 99-200,
17 *Numbering Resource Optimization [Second Report and Order]*
18 paragraphs 179 through 182; and

19 d. *Numbering Resource Optimization*, Order, CC Docket No.
20 96098, 99-200, DA 01-386 (rel. February 14, 2001) (addressing
21 petitions for additional delegation of authority to implement
22 numbering resource optimization strategies filed by the following
23 state commissions: Louisiana, Maryland, Massachusetts, and New
24 Jersey). [*Second State Delegation Order*] paragraphs 19 through
25 21.

26 In the *First Report and Order* the FCC adopted three

1 categories of thousands-block numbering pooling (TBNP) costs:

2 a. Shared industry costs, costs incurred by the industry as
3 a whole (including NANP administrator costs, and enhancements to
4 the number portability regional database);

5 b. Carrier-specific costs directly related to thousands-
6 block number pooling implementation (such as enhancements to
7 carriers' SCP, LSMS, SOA, and OSS systems); and

8 c. Carrier-specific costs not directly related to thousands-
9 block number pooling administration. [First Report and Order ¶¶
10 201-203].

11 The FCC ruled that the first two cost categories would be
12 recoverable and the third category would not. [First Report and
13 Order ¶ 205].

14 Regarding shared industry costs, the FCC stated:

15 We conclude that the allocation of shared industry
16 costs only among the carriers that participate in
17 thousands-block number pooling or through a per-
18 number charge, based on the quantity of numbers held
19 by a carrier, would not comply with the section
20 251(e)(2) requirement that all telecommunications
21 carriers bear the cost of numbering administration on
22 a competitively neutral basis. (Footnote omitted). In
23 particular, we believe that such a mechanism would
24 penalize new CLECs and other carriers, such as CMRS
25 and paging carriers, that require large quantities of
26 numbers to provide their services. (Footnote
omitted). We further conclude that the costs of
thousands-block number pooling be allocated to all
telecommunications carriers in proportion to each
carrier's interstate, intrastate, and international
telecommunication end-user revenues. Allocation of
thousands-block number pooling costs according to a
carrier's interstate, intrastate, and international
telecommunication end-user revenues is consistent
with the established precedent for cost recovery for
NANP administration using the NANPA formula, as well

1 as our cost recovery mechanism for number
2 portability.

3 [First Report and Order ¶ 207].

4 It follows that allocable TBNP trial costs should be
5 allocated to all telecommunications carriers in proportion to
6 each carrier's interstate, intrastate, and international
7 telecommunication end-user revenues.

8 **7. How should number pooling costs be recovered?**

9 Please see Qwest's response to Staff 01-006. With regard to
10 cost recovery requirements for TBNP trials, among other things,
11 the FCC's *First Report and Order* provides:

12 We also adopt our tentative conclusion that the costs
13 of thousands-block number pooling are not subject to
14 separations under the exclusively federal cost
15 recovery mechanism. As a federal cost recovery
16 mechanism, the costs incurred are interstate costs,
17 so there are no intrastate costs to be allocated to
18 the state jurisdiction. Therefore, we will allow
19 incumbent LECs to recover all their qualifying costs
20 for thousands-block number pooling under the federal
21 cost recovery mechanism we establish. We note,
22 however, that the implementation and administration
23 of national thousands-block number pooling will not
24 be effective immediately. Until national thousands-
25 block number pooling is implemented and a federal
26 cost recovery mechanism authorized, states may use
27 their current cost recovery mechanisms to ensure that
28 the carriers recover the costs of thousands-block
29 number pooling implementation and administration in
30 the meanwhile. Costs incurred by carriers to
31 implement state-mandated thousands-block number
32 pooling are intrastate costs and should be attributed
33 solely to the state jurisdiction.

34 [¶197] (emphasis added).

35 Among other things, the FCC's *State Delegation Order*
36 provides:

1 [B]ecause the FCC's national cost recovery plan will
2 not be in effect until national thousands-block
3 number pooling implementation occurs, states
4 conducting their own pooling trials must develop
5 their own cost recovery mechanisms for the joint and
6 carrier-specific costs of implementing and
7 administering pooling within their states. The
8 individual state cost-recovery schemes, however, must
9 transition to the national cost-recovery plan when
10 the latter becomes effective.

11 [¶21] (emphasis added).

12 The state commissions must also determine how
13 carrier-specific and joint costs directly related to
14 pooling administration should be recovered. In the
15 *Numbering Resource Optimization Order*, the FCC
16 concluded that thousands-block number pooling is a
17 numbering administration function, and that section
18 251(e)(2) authorizes the FCC to provide the
19 distribution and recovery mechanism for the
20 interstate and intrastate costs of number pooling. In
21 exercising the authority delegated to them, the state
22 commissions must also abide by the same statute, and,
23 therefore, ensure that costs of number pooling are
24 recovered in a competitively neutral manner. We note
25 that the *Numbering Resource Optimization Order* found
26 that section 251(e)(2) requires all carriers to bear
the shared costs of number portability on a
competitively neutral basis, and, thus, established a
cost recovery mechanism that does not exclude any
class of carrier. We encourage the state commissions
to consider the *Numbering Resource Optimization Order*
and *Telephone Number Portability Order* for guidance
regarding the criteria with which a cost recovery
mechanism must comply in order to be considered
competitively neutral:

20 First, "a 'competitively neutral' cost
21 recovery mechanism should not give one
22 service provider an appreciable, incremental
23 cost advantage over another service provider,
24 when competing for a specific subscriber."
25 Second, the cost recovery mechanism "should
26 not have a disparate effect on the ability of
competing service providers to earn normal
returns on their investments." 49 [footnote
49: *Telephone Number Portability*, Fourth
Memorandum Opinion and Order on
Reconsideration, CC Docket No. 95-116, RM
8535, FCC 99-151, at ¶ 32 (rel. July 16,

1 1999) (citing Telephone Number Portability,
2 First Report and Order and Further Notice of
3 Proposed Rulemaking, 11 FCC Rcd 8352, 8420-21
(1996)); see also Numbering Resource
4 Optimization Order, 15 FCC Rcd at 7665.]

5 Consistent with the FCC's treatment of cost recovery
6 in the Telephone Number Portability proceeding and
7 Numbering Resource Optimization Order, we believe
8 that even those carriers that cannot participate in
9 thousands-block number pooling at this time will
benefit from the more efficient use of numbering
resources that pooling will facilitate. We encourage
the state commissions to consider the "road map"
provided by the FCC in the Numbering Resource
Optimization Order regarding cost recovery for
thousands-block number pooling.

10 [¶22] (emphasis added).

11 Among other things with regard to cost recovery requirements
12 for TBNP trials, the FCC's *Second Report and Order* provides:

13 In the *First Report and Order*, we adopted a
14 competitively neutral cost recovery framework for
15 thousands-block number pooling similar to the cost
16 recovery mechanism established for number
17 portability. 387 [footnote 387: *First Report and*
18 *Order*, 15 FCC Rcd at 7662, para. 193.] Specifically,
19 we concluded that the cost recovery mechanism must be
20 competitively neutral in that the costs for
thousands-block number pooling should not: (a) give
one provider an appreciable, incremental cost
advantage over another when competing for a specific
subscriber; and (b) have a disparate effect on
competing providers' abilities to earn a normal
return. 388 [footnote 388: *Id.* at 7664, para. 199.]

21 We...noted that costs associated with state
22 implemented pooling trials should be excluded from
the federal cost recovery mechanism.

23 [¶¶179-180] (emphasis added).

24 Among other things with regard to cost recovery requirements
25 for TBNP trials, the FCC's *Second Delegation Order* provides:

26 Consistent with the FCC's treatment of cost recovery
in the Telephone Number Portability proceeding and

1 *Numbering Resource Optimization First Report and*
2 *Order, we believe that even those carries that cannot*
3 *participate in thousands-block number pooling at this*
4 *time will benefit from the more efficient use of*
5 *numbering resources that pooling will facilitate and*
6 *thus should share in bearing the costs associated*
7 *with thousands-block number pooling.*

8 [¶21] (emphasis added).

9 Because all costs of state TBNP trials will be excluded from
10 the federal recovery mechanism, none of the costs associated with
11 the Arizona trial will be recoverable at the time of the national
12 TBNP deployment. All costs of the TBNP trial pooling in Arizona
13 must be recovered upon implementation of interim state pooling
14 through a state recovery mechanism.

15 In order to ensure that the costs of number pooling are
16 recovered in a competitively neutral manner, the cost of a TBNP
17 trial in Arizona must be recovered through a temporary end user
18 surcharge applied to all Arizona customers who benefit from the
19 number resource preservation that an Arizona TBNP trial supports.
20 The costs should be pooled and recovered from all Arizona
21 customers who benefit, not just a company's own customers.

22 Recovery of costs from a company's own customers only would
23 not be competitively neutral because some carriers will not
24 participate in the trial. If costs were recovered only from
25 companies that participate in the trial, carriers that do not
26 participate in the trial would gain a competitive advantage by
27 avoiding the costs of the trial.

28 TBNP helps to preserve numbering resources, which helps
29 delay the need for new Area Codes (NPAs). The benefits of

1 avoiding new NPAs are not limited to the customers of the company
2 or companies that deploy TBNP but extend to all customers in the
3 NPA where TBNP is deployed.

4 8. Are there unique aspects of your network in Arizona as
5 compared to those found in states where number pooling has
6 already been implemented?

7 The Phoenix rate center covers a heavily populated and very
8 large geographic area. In addition, it is divided into three
9 separate NPA areas. Pooling in this rate center will be
10 complicated by the fact that telephone numbers cannot be ported
11 across NPA boundaries. This unique configuration will require
12 three separate and distinct pools with three separate and
13 distinct pool implementation schedules. In addition, the pooling
14 trial for these three NPAs will have to be implemented on a
15 schedule that does not conflict with the area code split that is
16 schedule for the Arizona 520 NPA.

17 9. Are there rate centers within the state that can be
18 consolidated? If so, which ones and how soon could it be
19 accomplished?

20 Qwest supports examining rate center consolidation on a
21 case-by-case basis. Qwest has successfully consolidated rate
22 centers in Minneapolis, Denver, Phoenix and Tucson. However, it
23 is critical that such consolidations be revenue and expense
24 neutral and occur between rate centers within the same local
25 calling area.

26

1 It must be kept in mind that while rate center
2 consolidations can be a sound numbering device, such
3 consolidations generally result in a greater number of switches
4 and more numbers within a rate center. As more switches are
5 incorporated in a rate center, there are increased problems for
6 carriers in meeting the utilization threshold and Months-to-
7 Exhaust criteria that was mandated by the FCC. In many cases
8 this will lower the average utilization and extend the Months to
9 Exhaust for the rate center. The risk to customers and service
10 providers alike is that they may not have sufficient numbers to
11 meet a specific customer demand for numbers, among other things.

12 In the Numbering Resource Optimization proceeding, the FCC
13 recognized that there may be instances where a carrier has a
14 specific need for additional numbers and may not be able to get
15 them based upon the new requirements. In these situations the
16 carriers have been instructed to seek waivers from the
17 appropriate state commission. If additional rate center
18 consolidation is mandated, state commissions, as well as the
19 NANPA or the pooling administrator, may be put in the position
20 where they need to dedicate more time and energy to reviewing and
21 granting service providers' requests for numbers.

22 Qwest studied the rate centers in Arizona in October of 2000
23 and came to the conclusion that the thirteen that share common
24 local calling are not strong candidates for consolidation. If
25 these thirteen rate centers had been consolidated into four as of
26 January 1999, a total of two NXX codes would have been saved over

1 two years. Based upon the concern we have for creating multiple
2 switch rate centers and the potential negative impact on our
3 ability to qualify for additional numbering resources on a rate
4 center basis, we do not recommend these rate center
5 consolidations take place at this time.

6 10. What degree of contamination (i.e. 5%, 10%, etc.)
7 should be allowed in thousands-blocks donated to the numbering
8 pool?

9 The degree of contamination, which is the amount of numbers
10 within a thousands block that are not available for assignment,
11 should not exceed ten percent as defined by the FCC.

12 11. What other issues should be addressed as part of a
13 pooling trial?

14 The Arizona Phoenix MSA pooling trial should conform to the
15 number pooling criteria specified in the FCC's Numbering Resource
16 Optimization Order. This will allow for a cost effective
17 transition from a state pooling trial to the national pooling
18 requirements.

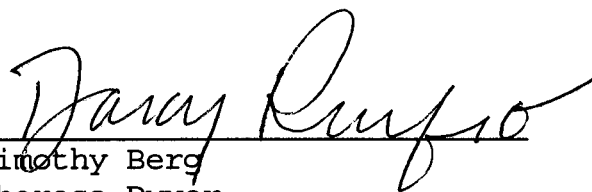
19 12. What additional number conservation methods may be
20 implemented to maximize the life of the NPAs in Arizona?

21 The industry should comply with the number conservation
22 methods defined in the FCC's Numbering Resource Optimization
23 Order. In addition, the Commission should periodically review
24 each service provider's number utilization reports to determine
25 if there are numbering resources that can be reclaimed for
26 assignment.

1 DATED this 7th day of March, 2001.

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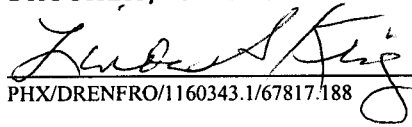
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